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Attorneys for Plaintiffs
MASTERPIECE LEADED WINDOWS CORPORATION

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

MASTERPIECE LEADED WINDOWS)	Civil No. 08-CV-0765-JM (JMA
)	PLAINTIFF'S INITIAL DISCLOSURE
Plaintiff,)	F.R.C.P. 26(a)(1)
v.)	
SONNY J. JOSLIN, an individual, ERIC)	
JAMES TINGEY, an individual, DECOR)	
DOOR & WINDOW, INC.,)	
Defendants.)	

Plaintiff, by and through his respective counsel, Gastone Bebi, hereby makes the following initial disclosure under F.R.C.P. 26(a)(1).

Witnesses

Plaintiffs identify the witnesses required to be identified under F.R.C.P. 26(a)(1), in Exhibit A hereto.

Documents

Plaintiffs identify the following documents required to be identified pursuant to F.R.C.P. 26(a)(1): (1) California Department Of Corporations Decor A door printout; (2) Decor A Door web site printout; (3) Masterpiece Invoice Register re: Decor A Door; (6) Sonny Joslin Payroll/Commission data,

1 2002-2007; (7) Compilation of Masterpiece Homeowner jobs sold in Inland Empire 2003-present; (8)
2 Compilation of Masterpiece Homeowner sales 2003-present; (9) Decor A Door credit Application; (10)
3 Seller's Permit Certification.

4 Plaintiffs are continuing to search for additional documents pertaining to the subject matter of
5 Plaintiffs' complaint and will identify and make said materials available for inspection and copying if
6 and as such documents are located.

7 Damages

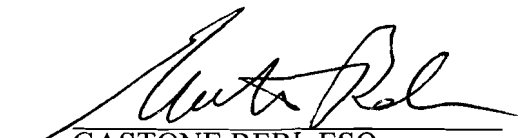
8 Plaintiff seeks economic damages from the date of the unfair competition/Lanham Act violations
9 to the date of trial, and future damages thereafter. Plaintiff requires an accountant/economist to compute
10 this amount. These calculations will be provided in conformance with the parties Discovery Plan.
11 Plaintiff also seeks treble and punitive damages where appropriate and attorney fees, which are
12 continuing and cannot be calculated until conclusion of the case.

13 Reservations

14 This disclosure is made without prejudice to Plaintiff's right to name new witnesses and produce
15 additional documents and materials for inspection. Plaintiff has not completed its analysis and
16 investigation of this matter. Plaintiff expects that additional witnesses, documents and other materials,
17 the relevance of which is not now appreciated, may come to light after this disclosure. Accordingly,
18 Plaintiff fully reserves the right to supplement this disclosure.

19
20 DATED: September 9, 2008

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24 GASTONE BEBI, ESQ.
25 Attorney for Plaintiffs
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Plaintiffs' Initial Disclosures, FRCP 26

EXHIBIT A

1. Jim Debus, Masterpiece Leaded Windows, Corporation 13831 Danielson Street, Poway Ca 92064, (858) 391-3344

2. Joel Debus, Masterpiece Leaded Windows, Corporation 13831 Danielson Street, Poway Ca 92064, (858) 391-3344

3. William O'Conner, C/O Masterpiece Leaded Windows, Corporation 13831 Danielson Street, Poway Ca 92064, (858) 391-3344

4. Individuals sold Decor a Door Products-whose identities and addresses are yet unknown to plaintiff.

The following individuals are believed to be employed by defendants, or their addresses and telephone numbers are known to defendants:

1. Sonny Joslin

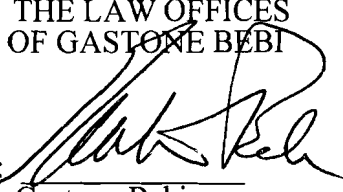
2. James Tingey

Plaintiffs anticipate retaining an accountant/economist to calculate and assign a value to plaintiff's business losses. Plaintiffs will designate and produce expert reports in conformance with the discovery plan submitted to the court.

Dated: September 11, 2008

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By:


Gastone Bebi
Attorney for Plaintiffs

Plaintiffs' Initial Disclosures, FRCP 26